

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183

MOTION TO EXTEND DEADLINE FOR EXPORT REPORTS

NOW COMES, the Plaintiff, Robert Stoud, by and through his counsel, and in support of this motion, avers as follows:

1. Pursuant to an Order dated April 17, 2019 (Doc. 43) entered by this Honorable Court, expert reports are due from the Plaintiff on or before June 17, 2019; from the Defendant on or before August 2, 2019; supplementations, if any, by the Plaintiff on or before September 3, 2019 and by Defendant on or before October 4, 2019.
2. The undersigned retained Patricia Staples, an HR expert, from C3 Group and met with her over a month ago.
3. On June 13, 2019, Ms. Staples contacted the undersigned and requested a two week extension to deliver her report due to unforeseen circumstances on her part.

4. The Plaintiff is seeking to extend the deadlines for expert reports by two weeks.

5. The requested extension will not unreasonably delay trial.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court extend the deadlines for expert reports.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
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/s/ Christopher J. Szewczyk, Esquire
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Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
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Date: June 14, 2019

CERTIFICATE OF CONCURRENCE

The undersigned hereby certifies that on June 14, 2019, he contacted A. James Hailstone, Esquire requesting concurrence in the foregoing motion. As of the time of this filing, the undersigned has not yet received a response.

/s/ Christopher J. Szewczyk, Esquire
Christopher J. Szewczyk, Esquire
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
(570) 348-0776

Dated: June 14, 2019

CERTIFICATE OF SERVICE

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 14th day of June, 2019.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire